

The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BOSTON GAS COMPANY D.T.E. 04-88

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BOSTON GAS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Boston Gas Company d/b/a KeySpan Energy Delivery New England ("Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

- 1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
- 3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

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- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
- 6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit five (5) copies of the responses to Jeanne L. Voveris, Hearing Officer.
- 8. In addition to filing, all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

- DTE 1-1 Please provide a schedule that shows for 2003:
 - 1. the daily actual degree days;
 - 2. the daily normal degree days; and
 - 3. the difference between actual and normal degree days.
- DTE 1-2 Please revise page 5 of Attachment 2 inserting rows for: (1) residential; and (2) commercial and industrial ("C&I") sub-totals.
- DTE 1-3 Please provide the actual monthly billing volumes by rate class for 2003 in a format similar to the revised schedule requested in Information Request DTE 1-2.

- DTE 1-4 Please provide the source documentation and all supporting calculations for the average quarterly and annual inflation indices shown in Attachment 2, at 2.
- DTE 1-5 Refer to Attachment 3, at 7. Please provide all supporting schedules and workpapers showing how the proposed billing day revenue adjustments for each rate class were determined.
- DTE 1-6 Attachment 3, "Revenue Adjustment Support" (Column (3)), states that "the Company also made an adjustment to customer charge revenues" to account for customers bills based on a 30-day month. Please provide the amount of such customer charge revenue adjustment and describe with supporting schedules how such an adjustment was determined. Indicate if this adjustment is included in the proposed billing day revenue adjustment of \$1,677,786.
- DTE 1-7 Refer to Attachment 3, "Revenue Adjustment Support" (Column (3)). Please clarify the statement: "[t]his calculation is shown on the attached workpaper (page 9)." Provide a copy of the workpaper referred to therein.
- DTE 1-8 Please reconcile the difference between the amount of weather normalization revenue adjustment shown on page two of the filing letter dated September 16, 2004 and the amounts shown in Attachment 1 and/ or Attachment 4, at 2.
- PTE 1-9 Refer to Attachment 4. Please perform the weather normalization process on a rate class basis, instead of the per customer basis, consistent with the "rate class aggregate method" noted in <u>Boston Gas Company</u>, D.P.U. 96-50, at 39 (1996). Describe the Company's method and all assumptions used. Provide all supporting workpapers.
- DTE 1-10 Refer to Attachment 7. Please provide a copy of the proposed bill insert.